EXHIBIT 3

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The Oversight Board's and PREPA's Initial Categorical Privilege Log of Documents Withheld in Response to Creditor's Requests April 28, 2023*

Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
1.	04/2022 — 12/2022	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa Proskauer Rose LLP ("Proskauer") (Oversight Board Advisor) Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot Stevens; Daniel Desatnik; Joshua Esses Citigroup Global Markets Inc. ("Citigroup") (Oversight Board Advisor)	Confidential documents and communications reflecting and exchanging legal advice analyzing and considering settlement proposals received from creditors, drafting, reviewing, and discussing settlement proposals to creditors, and discussing analyses regarding settlement proposals received, including analyses regarding rates, during the Court-ordered mediation between the Oversight Board, AAFAF, the Ad Hoc Group, National, Assured, Syncora, UTIER, SREAEE, the UCC, and the Fuel Line Lenders.	Attorney-Client Privilege; Work Product; Mediation Privilege; Deliberative Process Privilege	AHG Request No. 11 AHG Request No. 12 AHG Request No. 13

^{*} This categorical log reflects the Oversight Board's and PREPA's good faith, reasonable efforts to categorize responsive documents withheld on the basis of the deliberative process privilege, the attorney client privilege, the work product doctrine, the mediation privilege (including the Court's orders regarding mediation in these Title III Cases, FRE 408, as well as any federal, state, or local analogues), and the common interest doctrine as of the date indicated. The Oversight Board and PREPA reserve the right to amend or supplement this categorical log.

¹ In addition to the individuals listed in this column, recipients include the listed individuals' subordinates within the respective entities. Each individual identified in each category is not included on every communication covered by the category.

² This column reflects the specific requests received by the Oversight Board from: the Ad Hoc Group of PREPA Bondholders ("<u>AHG Request</u>"); the Official Committee of Unsecured Creditors ("<u>UCC Request</u>"); the Ad Hoc Committee of National Claims Assignees ("<u>AHC Request</u>"); Cobra Acquisitions ("<u>Cobra Request</u>"); Unión de Trabajadores de la Industria Eléctrica y Riego Inc. ("<u>UTIER Request</u>"); and the Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica ("SREAEE Request").

Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
		David Brownstein; James Castiglioni; John C. Gavin Ernst & Young ("EY") (Oversight Board Advisor) Shawn Dubinsky; Adam Chepenik; Juan Santambrogio; Sofia Panagiotakis; Trenton Bradley; Laura Wheeler; Daniel Mullins; Gaurav Malhotra McKinsey & Company ("McKinsey") (Oversight Board Advisor) AK Mahadevan; Rachel Enright Brattle Group ("Brattle") (Oversight Board Advisor) Jurgen Weiss; Bill Zarakas; Alberto Vargas; Andrew Grose; Akhilesh Ramakrishan			
2.	04/2022 – current	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El Koury Proskauer	Confidential documents and communications regarding the Plan and Disclosure Statement, including concerning the drafting of the Plan or Disclosure Statement, their terms and components, such as the PREPA PayGo Trust and the New Bond Master Indenture, any analyses of the Plan, such as whether it meets confirmation requirements, and plans to obtain approval	Attorney-Client Privilege; Work Product; Common Interest	AHG Request No. 2 AHC Request No. 1 AHC Request No. 7 UCC Request No. 5 UCC Request No. 6 UCC Request No. 31

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Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
		Paul Possinger; Ehud Barak;	of the Disclosure Statement and		UCC Request No. 60
		Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot	confirmation of the Plan.		UCC Request No. 61
		Stevens; Daniel Desatnik;			UTIER Request No. 5
		Joshua Esses			UTIER Request No. 6
		Citigroup David Brownstein; James Castiglioni; John C. Gavin			
		EY Shawn Dubinsky; Adam Chepenik; Juan Santambrogio; Sofia Panagiotakis; Trenton Bradley; Laura Wheeler; Daniel Mullins; Gaurav Malhotra			
		McKinsey AK Mahadevan; Aaron Bielenberg; Rachel Enright			
		Brattle Jurgen Weiss; Bill Zarakas; Alberto Vargas; Andrew Grose; Akhilesh Ramakrishan			
		Weil Gotshal & Manges LLP ("Weil") (National Advisor) Matthew Barr; Gabriel Morgan			

Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
		Wachtell, Lipton, Rosen & Katz ("Wachtell") (Fuel Line Lenders' Advisor) Richard Mason; Amy Wolf; Emil Kleinhaus; Stephanie Marshak; Michael Cassel; Angela Herring			
3.	04/2022 - 03/01/2023	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El Koury Proskauer Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot Stevens; Daniel Desatnik; Joshua Esses EY Shawn Dubinsky; Adam Chepenik; Juan Santambrogio; Sofia Panagiotakis; Trenton Bradley; Laura Wheeler; Daniel Mullins; Gaurav Malhotra	Confidential, pre-decisional, deliberative documents and communications regarding development of the Legacy Charge, including analyzing models and calculations performed by advisors and discussing analyses of the Legacy Charge in the context of the Plan's other terms and provisions.	Deliberative Process	AHG Request No. 2 AHG Request No. 8 UCC Request No. 30 UCC Request No. 31 UTIER Request No. 30 UTIER Request No. 33 SREAEE Request No. 6

Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
4.	5/3/2018 - 03/08/2022	AK Mahadevan; Aaron Bielenberg; Rachel Enright Brattle Jurgen Weiss; Bill Zarakas; Alberto Vargas; Andrew Grose; Akhilesh Ramakrishan Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El Koury Proskauer Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale Citigroup David Brownstein; James Castiglioni; John C. Gavin	Confidential documents and communications exchanging and providing legal advice from in-house and outside counsel regarding the 2019 RSA, including, among other things, the circumstances under which the 2019 RSA could be terminated and whether to terminate the 2019 RSA.	Attorney-Client Privilege; Work Product	AHG Request No. 4
5.	04/2022 — 12/2022	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El Koury	Confidential presentations prepared by Oversight Board advisors, with the assistance of counsel, and presented to the Oversight Board during the course of the Court-ordered mediation between the Oversight Board, AAFAF, the Ad Hoc	Attorney-Client Privilege; Work Product; Mediation Privilege; Deliberative Process	AHG Request No. 17 AHC Request No. 9

Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
6.	1/2023 – current	Proskauer Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot Stevens; Daniel Desatnik; Joshua Esses Citigroup David Brownstein; James Castiglioni; John C. Gavin Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury; Fernando Bruno Ramírez de Arellano; Fausto J Hernández McKinsey AK Mahadevan; Rachel Enright EY Shawn Dubinsky; Adam Chepenik; Juan Santambrogio; Gaurav Malhotra	Group, National, Assured, Syncora, UTIER, SREAEE, the UCC, and the Fuel Line Lenders, providing analysis and containing, providing, or reflecting legal advice concerning the status of the mediation, details of proposals received by the Oversight Board, and proposals made to creditors on behalf of the Oversight Board and/or discussing analyses regarding settlement proposals received, including analyses regarding rates. Confidential, pre-decisional, deliberative documents and communications regarding planning and development of the 2023 PREPA Fiscal Plan, including any communications consisting of requests for and delivery of legal advice from in-house counsel.	Deliberative Process; Attorney-Client Privilege; Work Product	AHG Request No. 30 UCC Request No. 37

Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
7.	10/2022 - 04/03/2023	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury; Ginorly Maldonado McKinsey	Confidential, pre-decisional, deliberative documents and communications regarding planning and development of the 2023 Commonwealth Fiscal Plan, including any communications consisting of requests for and delivery of legal advice from in-house counsel.	Deliberative Process; Attorney-Client Privilege; Work Product	UCC Request No. 37
		Juan Rebolledo, Jonathan Davis, Ojas Shah EY Shawn Dubinsky; Adam Chepenik; Juan Santambrogio; Gaurav Malhotra			
8.	4/2022 – current	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury; Fernando Bruno Ramírez de Arellano; Fausto J Hernández	Confidential communications requesting and providing legal advice regarding negotiations with PREPA's pension funds, PREPA's pension underfunding, treatment of PREPA ERS participants, whether to reject any of PREPA's collective bargaining agreements, and the related restructuring of PREPA's debts.	Attorney-Client Privilege; Work Product; Deliberative Process	AHG Request No. 5 AHG Request No. 22
		Proskauer Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot			

Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
		Stevens; Daniel Desatnik; Joshua Esses EY Shawn Dubinsky; Adam Chepenik; Juan Santambrogio; Sofia Panagiotakis; Trenton Bradley; Laura Wheeler; Daniel Mullins; Gaurav Malhotra; Sheva Levy; Clark Good; Rob Tague			
9.	04/2022 — 12/2022	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury; Fernando Bruno Ramírez de Arellano; Fausto J Hernández Proskauer Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot Stevens; Daniel Desatnik; Joshua Esses	Confidential documents and communications regarding mediation between the Oversight Board and SREAEE in the context of the Court-ordered mediation between the Oversight Board, AAFAF, the Ad Hoc Group, National, Assured, Syncora, UTIER, SREAEE, the UCC, and the Fuel Line Lenders, including the analysis of claims, exchange of proposals, and negotiation of the terms of a settlement.	Mediation Privilege	AHG Request No. 5 AHG Request No. 22

Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
		Bufete Emmanuelli, C.S. P. (SREAEE Advisor) Zoé Negrón-Comas; Rolando Emmanuelli Jiménez; Jessica E. Méndez-Colberg			
10.	12/2022 — 02/2022	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury Proskauer Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot Stevens; Daniel Desatnik; Joshua Esses Citigroup David Brownstein; James Castiglioni; John C. Gavin	Confidential documents and communications concerning the Uninsured Bond Settlement Agreement, including documents and communications regarding its terms, distribution, or subsequent treatment of the claims held by any signor of the agreement.	Attorney-Client Privilege; Work Product	AHC Request No. 23
11.	06/2019 – current	Oversight Board Jaime El-Koury Proskauer Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret	Confidential documents and communications concerning proofs of claim filed against PREPA, including analysis of the merits of the claims, any objections	Attorney-Client Privilege; Work Product	UCC Request No. 51 UCC Request No. 54 UCC Request No. 56 UCC Request No. 57

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Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
		Dale; Michael Mervis; Elliot Stevens; Daniel Desatnik; Joshua Esses; Laura Stafford; Jordan Sazant	thereto, the extent of any possible payments or recovery, and treatment under the Plan.		
		Berkeley Research Group ("BRG") Mark Shankweiler; Robert Cohen			
12.	04/2022 — 12/16/2022	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury Proskauer Brian Rosen; Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot Stevens; Daniel Desatnik; Joshua Esses Citigroup David Brownstein; James Castiglioni	Confidential documents and communications regarding settlement proposals between National and the Oversight Board in the context of the Court-ordered mediation between the Oversight Board, AAFAF, the Ad Hoc Group, National, Assured, Syncora, UTIER, SREAEE, the UCC, and the Fuel Line Lenders, including any analysis of National's claims, negotiation of the terms of the settlement, and the impact of the settlement on the Plan and other creditors, and any communications requesting, exchanging, containing, or reflecting legal advice regarding these topics.	Mediation Privilege	AHG Request No. 5 AHC Request No. 4 AHC Request No. 5 AHC Request No. 9 UCC Request No. 15 UCC Request No. 16 UCC Request No. 17 UCC Request No. 19 UCC Request No. 22 UCC Request No. 27 UCC Request No. 28 UCC Request No. 29
		Weil Matthew Barr; Gabriel Morgan			

Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
12A.	12/16/2022 — 01/31/2023	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury Proskauer Brian Rosen; Martin Bienenstock Citigroup David Brownstein; James Castiglioni Weil Matthew Barr; Gabriel Morgan	Confidential documents and communications regarding the PREPA Plan Support Agreement between National and the Oversight Board in the context of the Court-ordered mediation between the Oversight Board, AAFAF, the Ad Hoc Group, National, Assured, Syncora, UTIER, SREAEE, the UCC, and the Fuel Line Lenders, including any analysis of National's claims, negotiation of the terms of the settlement, and the impact of the settlement on the Plan and other creditors, and any communications requesting, exchanging, containing, or reflecting legal advice regarding these topics.	Attorney-Client Privilege; Work Product; Mediation Privilege; Common Interest	AHG Request No. 5 AHC Request No. 4 AHC Request No. 5 AHC Request No. 9 UCC Request No. 15 UCC Request No. 16 UCC Request No. 17 UCC Request No. 19 UCC Request No. 22 UCC Request No. 27 UCC Request No. 28 UCC Request No. 29
12B.	12/16/2022 — 01/31/2023	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury; Fernando Bruno Ramírez de Arellano; Fausto J Hernández Proskauer	Confidential drafts of the PREPA Plan Support Agreement between National and the Oversight Board including drafts of any schedules, annexes, exhibits and term sheets, prepared in the context of the Court-ordered mediation between the Oversight Board, AAFAF, the Ad Hoc Group, National, Assured, Syncora, UTIER, SREAEE, the UCC, and the Fuel Line Lenders, and any communications requesting, exchanging,	Attorney-Client Privilege; Work Product; Mediation Privilege; Common Interest	AHC Request No. 2 AHC Request No. 3 AHC Request No. 5 UCC Request No. 14 UCC Request No. 15

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Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
		Brian Rosen; Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot Stevens; Daniel Desatnik; Joshua Esses Citigroup David Brownstein; James Castiglioni; John C. Gavin Weil Matthew Barr; Gabriel Morgan	containing, or reflecting legal advice regarding these drafts.		
13.	04/2022 - 11/19/2022	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury; Proskauer Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot Stevens; Daniel Desatnik; Joshua Esses Wachtell Richard Mason; Amy Wolf; Emil Kleinhaus; Stephanie	Confidential documents and communications regarding settlement proposals between the Fuel Line Lenders in the context of the Court-ordered mediation between the Oversight Board, AAFAF, the Ad Hoc Group, National, Assured, Syncora, UTIER, SREAEE, the UCC, and the Fuel Line Lenders, including any analysis of the Fuel Line Lenders' claims, negotiation of the terms of the settlement, and the impact of the settlement on the Plan and other creditors and any communications requesting, exchanging, containing, or reflecting legal advice regarding these topics.	Mediation Privilege	AHG Request No. 5 AHC Request No. 5 UCC Request No. 2 UCC Request No. 3 UCC Request No. 4 UCC Request No. 5

Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
		Marshak; Michael Cassel; Angela Herring			
13A.	11/19/2022 — 12/01/2022	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury Proskauer Paul Possinger Wachtell Richard Mason; Amy Wolf; Emil Kleinhaus; Stephanie Marshak; Michael Cassel; Angela Herring	Confidential documents and communications regarding the PREPA Plan Support Agreement between the Fuel Line Lenders in the context of the Court-ordered mediation between the Oversight Board, AAFAF, the Ad Hoc Group, National, Assured, Syncora, UTIER, SREAEE, the UCC, and the Fuel Line Lenders, including any analysis of the Fuel Line Lenders' claims, negotiation of the terms of the settlement, and the impact of the settlement on the Plan and other creditors and any communications requesting, exchanging, containing, or reflecting legal advice regarding these topics.	Attorney-Client Privilege; Work Product; Mediation Privilege; Common Interest	AHG Request No. 5 AHC Request No. 5 UCC Request No. 2 UCC Request No. 3 UCC Request No. 4 UCC Request No. 5
13B.	11/19/2022 — 12/01/2022	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury; Fernando Bruno Ramírez de Arellano; Fausto J Hernández Proskauer	Confidential drafts of the PREPA Plan Support Agreement between the Fuel Line Lenders and the Oversight Board, including drafts of any schedules, annexes, exhibits and term sheets, prepared in the context of the Court-ordered mediation between the Oversight Board, AAFAF, the Ad Hoc Group, National, Assured, Syncora, UTIER, SREAEE, the UCC, and the Fuel Line Lenders and any communications requesting, exchanging, containing, or	Attorney-Client Privilege; Work Product; Mediation Privilege; Common Interest	AHG Request No. 5 AHC Request No. 5 UCC Request No. 1

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Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
		Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot Stevens; Daniel Desatnik; Joshua Esses Wachtell Richard Mason; Amy Wolf; Emil Kleinhaus; Stephanie Marshak; Michael Cassel;	reflecting legal advice regarding these topics.		
		Angela Herring Proskauer			
14.	07/14/2022 - 08/26/2022	Margaret Dale Susman Godfrey Alex Kaplan	Confidential documents and communications regarding the settlement between Vitol and the Oversight Board, including drafts of any schedules, annexes, exhibits and term sheets.	Common Interest Privilege; Attorney- Client Privilege	AHG Request No. 5
15.	09/12/2019	DLA Piper (PREPA Advisor) Kristin H. R. Franceschi PREPA Diego Figueroa-Rodriguez Sarah Ritter Proskauer Laura Stafford; Jordan Sazant; Paul Possinger; Ehud Barak BRG	Confidential draft memorandum reflecting legal advice and analysis regarding the status of audits into certain bonds issued by PREPA.	Common Interest Privilege; Attorney- Client Privilege; Work Product	UCC Request No. 56

Category No.	Approximate Date Range	Aggregate Recipient List ¹	Category Description	Privilege Basis	Request(s) ²
		Mark Shankweiler; Robert Cohen			
16.	12/2022	Citigroup James Castiglioni; David Brownstein; John C. Gavin	Confidential projection, prepared at the request of counsel, of volumetric and fixed charge cash flows underlying model supporting Oversight Board settlement proposal during Court-ordered mediation between the Oversight Board, AAFAF, the Ad Hoc Group, National, Assured, Syncora, UTIER, SREAEE, the UCC, and the Fuel Line Lenders.	Mediation Privilege; Attorney-Client Privilege; Work Product	AHG Request No. 11
		Proskauer Laura Stafford; Margaret Dale; Paul Possinger; Ehud Barak; Julia Alonzo; Michael Mervis; Daniel Desatnik; Jordan Sazant; Javier Sosa			
17.	01/2017 - current	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El-Koury; Fernando Bruno Ramírez de Arellano; Fausto J Hernández	Confidential documents and communications reflecting and exchanging legal advice and analyzing proposals regarding the privatization of PREPA.	Attorney-Client Privilege; Work Product	
		Citigroup James Castiglioni; David Brownstein; John C. Gavin			
		Proskauer Laura Stafford; Margaret Dale; Paul Possinger; Ehud Barak; Julia Alonzo; Michael Mervis;			

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		Daniel Desatnik; Jordan Sazant; Javier Sosa			
18.	01/2021	Oversight Board David Skeel; Andrew Biggs; Arthur González; Antonio Medina; John Nixon; Justin Peterson; Betty Rosa; Alejandro Figueroa; Jaime El Koury Proskauer Paul Possinger; Ehud Barak; Martin Bienenstock; Margaret Dale; Michael Mervis; Elliot Stevens; Daniel Desatnik; Joshua Esses Brattle Jurgen Weiss; Bill Zarakas; Alberto Vargas; Andrew Grose; Akhilesh Ramakrishan	Confidential documents and communications regarding Brattle's financial analysis of PREPA, prepared at the request of counsel.	Attorney-Client Privilege; Work Product	